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EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., et al.,
Debtors.³⁰**

Chapter 11

**Case No. 19-23649 (RDD)
(Jointly Administered)**

[PROPOSED] ORDER

Upon the motion (the “**Motion**”) of Purdue Pharma L.P. and its affiliates that are debtors and debtors in possession in these proceedings (collectively, the “**Debtors**”) for entry of an order (this “**Order**”) denying the *Official Committee of Unsecured Creditors’ Motion to Compel Production of Purportedly Privileged Documents, or for In Camera Review, Based on Failure of the Sacklers and the Debtors to Demonstrate Documents Identified on Logs Are Privileged* [Dkt. No. 1752] (“**Privilege Log Motion**” or “**Log Motion**”) and denying the *Official Committee of Unsecured Creditors’ Motion to Compel Production of Purportedly Privileged Documents, or for In Camera Review, Based on Good Cause, Crime Fraud, and At Issue Waiver Exceptions to Claims of Privilege* [Dkt. No. 1753] (“**Exceptions Motion**”) (collectively, “**Privilege Motions**”) and limiting discovery from the Debtors to certain categories of documents and other information already agreed by the Debtors and limiting the

³⁰ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

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scope of depositions to estate claims and third party releases, and upon the record of the hearing held by the Court on October 28, 2020, and all objections to the Motion having been withdrawn or overruled; and the Court having jurisdiction over the Motion pursuant to 28 U.S.C. § 1334(a); and the venue of these chapter 11 cases and the Motion being proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409; and the Motion being a core proceeding pursuant to 28 U.S.C. § 157(b); and the Court having authority to enter a final order with respect to the Motion; and no additional notice being required except as provided herein; and, after due deliberation and good and sufficient cause appearing; now, therefore,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Debtors' Motion is GRANTED.
2. The Official Committee of Unsecured Creditors' Privilege Motions are DENIED.
3. Any additional discovery of documents from the Debtors shall be limited to the following categories of documents previously agreed by the Debtors:
 - i. Documents and information that the Debtors have agreed to produce under paragraphs 1-14 of the Stipulation and Agreed Order Among the Official Committee, the Non-Consenting States Group and the Debtors Regarding Discovery in the Chapter 11 Cases (Aug. 26, 2020) [Dkt. No. 1623] ("ESI Stipulation") ¶¶ 1-14.
 - ii. Documents and information that the Debtors have previously agreed in writing in response to tailored requests from the Official Committee of Unsecured Creditors.
4. Depositions of Debtor witnesses shall be limited to witnesses and topics

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directly relevant to potential estate claims and third party releases.

5. Nothing in this Order shall preclude the Debtors from agreeing to produce documents or information not set forth in paragraphs 3 and 4 above.

SO ORDERED.

Dated: _____
White Plains, New York

By: _____
The Honorable Robert D. Drain
United States Bankruptcy Judge